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*Attorneys for Defendants*  
SAMUEL M. GLINES & JERROLD  
KRYSTOFF

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

AKIRA ISHIYAMA,

Plaintiff,

vs.

SAMUEL M. GLINES, JERROLD  
KRYSTOFF, DOES I through XX and ROE  
BUSINESS ENTITIES I through XX,

Defendants.

CASE NO. 2:16-cv-00222-APG-PAL

**EMERGENCY MOTION FOR  
EXTENSION OF TIME TO FILE AN  
ANSWER OR OTHER RESPONSIVE  
PLEADING TO PLAINTIFF'S  
COMPLAINT**

**(FIRST REQUEST)**

COMES NOW Defendant Jerrold Krystoff, by and through his undersigned counsel, and for his Motion for Extension of Time to File an Answer or Other Responsive Pleading to Plaintiff's Complaint ("Motion") hereby states as follows:

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1. Defendant Jerrold Krystoff ("Krystoff") was served on April 13, 2016. His response to Plaintiff's Complaint is due on May 4, 2016.

2. On May 3, 2016, Krystoff unsuccessfully attempted to file a responsive pleading with the Court on a pro se basis. As a result, on May 4, 2016, Krystoff contacted the undersigned counsel to represent him in this matter.

3. Krystoff requests that this Court grant him an additional seven (7) days up to and including May 11, 2016 to file an answer or other responsive pleading to Plaintiff's Complaint.

4. This is Defendant Krystoff's first request for an extension of time to file an answer or other responsive pleading.

5. Counsel called and emailed Plaintiff's counsel, Jeffrey Bendavid, Esq. today, to request a seven day extension to file a responsive pleading. Mr. Bendavid would not agree to stipulate to the extension. See **Exhibit A** attached hereto.

6. This request is made in good faith and is not submitted for any improper purpose.

WHEREFORE Defendant Jerrold Krystoff respectfully requests that this Court grant him an additional seven (7) days up to and including May 11, 2016 to file an answer or other responsive pleading to Plaintiff's Complaint.

DATED this 4<sup>th</sup> day of May, 2016.

**KOLESAR & LEATHAM**

By Jonathan D. Blum, Esq.

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Nevada Bar No. 009515

SHLOMO S. SHERMAN, ESQ.


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-and-

IT IS SO ORDERED this 10th day of May, 2016.

  
 Peggy A. Leen  
 United States Magistrate Judge

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